



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**HON. SYLVIA O. HINDS-RADIX**  
*Corporation Counsel*

**ZACHARY T. ELLIS**  
*Assistant Corporation Counsel*  
Labor and Employment Law Division  
(212) 356-0839  
zellis@law.nyc.gov

September 16, 2022

**Via CM/ECF**

Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

**APPLICATION GRANTED  
SO ORDERED** *Vern Bro*  
**VERNON S. BRODERICK**  
**U.S.D.J.** 09/19/2022

The post-discovery conference is rescheduled to October 14, 2022 at 2:00pm. The parties are to use the dial-in 888-363-4749 and access code 2682448.

Re: *Oluseyi Adeniji v. The City of New York*  
Civil Case No. 1:19-CV-08032-VSB  
Law Department No. 2019-065312

Dear Judge Broderick,

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing Defendant, the City of New York ("the City"), in the above-referenced matter. In accordance with the Amended Case Management Plan and Scheduling Order of August 3, 2022, *see* CM/ECF No. 59, I submit this joint letter to advise the Court of the status of this case. In addition, the parties respectfully request that the post-discovery conference scheduled for October 5, 2022 (ECF No. 59) be adjourned until after the mediation, scheduled for October 7, 2022, is concluded. This is the parties first request for this action.

Regarding discovery, Plaintiff Oluseyi Adeniji was deposed on August 25, 2022. Additionally, from the City's perspective, the only outstanding discovery-related matter is that Mr. Adeniji produced tax-return release authorizations and an unemployment-records release authorization that contained missing information and therefore cannot be executed. The City has identified the missing information for Mr. Adeniji and asked him to provide new authorizations, and he has agreed to do so.

A first mediation session is scheduled for October 7, 2022.

If the parties are unable to resolve this dispute at mediation, the City intends to file a motion for summary judgment.

In order to conserve judicial resources and allow the parties to focus on settlement, the parties respectfully request that the Court adjourn the post-discovery conference until after the parties have had an opportunity to mediate this case.

Respectfully submitted,

/s/

Zachary T. Ellis

Assistant Corporation Counsel

cc: Pro-Se Plaintiff Oluseyi Adeniji and all counsel of record (via CM/ECF)